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March 21, 2014

Via ECF

The Honorable Allyne Ross, U.S.D.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Cando, et al v. Michigan Logistics Inc., et al.*
Case No. 13-cv-4369

Dear Judge Ross:

We are counsel to Plaintiffs on this matter. We write to advise the Court that the Plaintiffs accept Defendants' Rule 68 offer of judgment dated March 13, 2014 attached herein.

Plaintiffs' and Class members' New York State law claims remain outstanding against Michigan Logistics Inc. and Northeast Logistics Inc., and their federal and state law claims remain outstanding against the Parts Authority Defendants.

Respectfully submitted,

/s/ C.K. Lee

cc: all parties via ECF

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

MARIO CANDO and JUAN VALENCIA
TRUJILLO, on behalf of themselves, FLSA
Collective Plaintiffs and the Class,

Plaintiff,

v.

MICHIGAN LOGISTICS INC., NORTHEAST
LOGISTICS INC., et al.

Defendants.

Civil Action No. 13 CV 4369 (ARR)(VMS)

FRCP 68 OFFER OF JUDGMENT

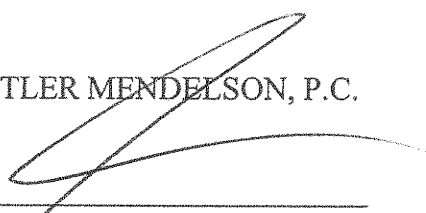
TO: LEE LITIGATION GROUP, PLLC
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Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Defendants offer to allow judgment to be taken upon the federal Fair Labor Standards Act claims asserted in the action by Mario Cando in the amount of twenty-four thousand five hundred seventy dollars (\$24,570) and by Juan Valencia Trujillo in the amount of thirty-two thousand seven hundred thirty dollars (\$32,730), together with reasonable attorneys' fees and costs incurred to date in connection with such federal claims such amount to be decided by the Court, in full and final settlement of all Plaintiffs' federal claims against all Defendants arising out of or related to, the facts and transactions alleged in the above-captioned action.

This offer is made for the purposes of Rule 68 only, and neither it nor any judgment resulting from this offer may be construed as an admission of liability or unlawful conduct by any defendant.

Date: March 13, 2014

LITTLER MENDELSON, P.C.



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